

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

LARADA SCIENCES, INC.,

Plaintiff,

vs.

PEDIATRIC HAIR SOLUTIONS  
CORPORATION and FLOSONIX  
VENTURES, LLC,

Defendants.

Case No. 3:18-cv-00320-RJC-DSC

**JOINT MOTION  
FOR ENTRY OF  
STIPULATED PROTECTIVE ORDER**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Plaintiff Larada Sciences, Inc. (“Larada”) and Defendants Pediatric Hair Solutions Corp. and FloSonix Ventures, LLC (collectively “PHS”) (hereinafter, the “Parties”), by and through their undersigned counsel, respectfully move the Court to enter the proposed Stipulated Protective Order attached to this motion. In support of this motion, the Parties show the Court the following:

1. This is a patent infringement case. As specified in the Complaint, Larada alleges that PHS has infringed and is infringing one or more claims of U.S. Patent Nos. 7,789,902, 8,162,999, 8,475,510, and D626,287 (collectively, the “Asserted Patents”). PHS has denied Larada’s allegations and raised affirmative defenses, including that the Asserted Patents are not infringed and/or are invalid or unenforceable.

2. Because of the nature of the factual issues involved in this case, the Parties anticipate that discovery may require the production and disclosure by the Parties and certain non-parties of information that may be confidential, proprietary, or trade-secret information,

including, without limitation, sensitive research, development, financial, and commercial information.

3. Pursuant to Local Patent Rule 2.2, and in connection with the deadlines in the Court's Claim Construction Scheduling Order (Doc. No. 18), the Parties have already produced documents designated "CONFIDENTIAL INFORMATION," "CONFIDENTIAL INFORMATION—ATTORNEYS EYES ONLY," and "CONFIDENTIAL SOURCE CODE—ATTORNEYS EYES ONLY." The Parties expect similarly confidential documents to be the subject of fact discovery, and seek similar protections for such documents.

4. Accordingly, there is good cause for the Court to enter a protective order limiting the disclosure and use of the information described above.

5. The Parties have attached to this motion and also are submitting to the Court via Cyber Clerk a proposed Stipulated Protective Order. All Parties have agreed to the terms of the proposed Stipulated Protective Order, and consent to its entry.

6. The Parties believe that the entry of the attached proposed Stipulated Protective Order appropriately balances the general right of public access to documents filed in federal court with the Parties' need to protect certain discoverable information from unauthorized disclosure. The Parties further believe that the attached proposed Stipulated Protective Order will facilitate a timely exchange of information and documents in discovery.

WHEREFORE, the Parties respectfully request that the Court enter the attached Stipulated Protective Order.

DATED this 8<sup>th</sup> day of May, 2019.

**/s/ D. Alan White**

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## **CERTIFICATE OF SERVICE**

I hereby certify that on May 8, 2019, a true and correct copy of the foregoing Joint Motion for Entry of Consent Protective Order was served upon the following individuals in the manner set forth below:

- Through the CM/ECF System for the U.S. District Court
- Hand Delivery
- U.S. Mail, postage prepaid
- E-mail

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